

Exhibit 39

I, Amaha Kassa, Esq. declare as follows:

1. I am the founder and the Executive Director of African Communities Together (ACT), one of the plaintiffs in this matter. I have been in my current position for approximately seven years. I have personal knowledge of the facts set forth below and if called upon to testify, I could and would do so competently.

2. ACT is a New York nonprofit corporation with organizational offices in New York, Washington D.C., and Virginia.

3. ACT was created in 2012 by African immigrants to support and empower African immigrants and their families. ACT is a membership organization with approximately 3,000 participating members throughout the country including Massachusetts, and also works with African associations, congregations, and African-serving organizations nationwide. Some of ACT's members are Liberian Deferred Enforced Departure (DED) holders.

4. ACT receives funding from individual donations, private foundation grants, and government contracts to provide immigration legal services.

5. ACT's mission is to advocate for civil rights, opportunities, and a better life for African immigrants and their families in the United States and worldwide, and to empower African immigrants to advance economically, integrate socially and engage civically.

6. ACT fulfills its mission by providing an array of services to its members and non-members within the immigrant community. Every year, ACT serves hundreds of African immigrants through providing free immigration legal services, legal referrals, and assistance with obtaining employment. ACT empowers African immigrants to engage civically on important social justice issues through convening monthly leadership trainings. ACT also

7. President Donald Trump's decision to terminate the DED program has harmed ACT. The mission of ACT, to serve its members, will be harmed because ACT's membership includes Liberian DED holders and their U.S citizen family members. The termination of the DED program will cause ACT to lose members (Liberian DED holders). Additionally, the termination of DED will cause ACT's DED holder members to lose their legal status, employment authorization, and as a result, they will forced to leave the United States.

8. I have personally spoken to ACT's Liberian DED holder members who have expressed their fear of having to leave the United States and return to Liberia, the emotional and economic impact of termination on their families, and concern over the uncertainty of their futures. Liberian DED holders have also expressed fear over applying for adjustment of their legal status and government benefits for which they qualify because they are concerned that this will place them at increased risk of deportation. I have spoken with Liberian DED holder members who have already lost their employment because their Employment Authorization Documents have expired and have not been renewed in a timely fashion by US Citizenship and Immigration Services.

9. ACT has also had to divert many of its limited resources and staff capacity because of President Trump's DED order. Many member and non-member Liberian DED holders, associations, churches, and service providers have contacted us about assisting them with immigration relief and employment issues, and my employees and I have diverted time to assisting them. Because of widespread questions and concerns from Liberian DED holders and Liberian community members about the impact of DED termination on the Liberian

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community, ACT has committed resources to education and outreach, including individual and group calls and meetings, organizing national conference calls, speaking to news media, and disseminating information via email and social media. I estimate that since the announcement of DED termination, ACT has expended approximately \$52,000 in staff time and direct expenditures in responding to the termination of DED.

10. ACT has carried out various forms of education and policy advocacy to make sure that policy makers are aware of the grave situation suffered by Liberian DED holders. ACT staff have communicated with policy makers in their districts and traveled to Capitol Hill to encourage Congress to include Liberian DED holders in any immigration legislation, so they may have a path towards permanent residency. In February, ACT mobilized dozens of our members, including several Liberian DED holders, to Washington, D.C. to participate in a public march and meet with members of Congress. ACT has also met and spoken with representatives of local government, including the New York City Mayor's Office of Immigrant Affairs, the Washington, D.C. Mayor's Office on African Affairs, the Montgomery County, MD African Affairs Advisory Group, and the Philadelphia, PA Office of Immigrant Affairs to discuss the impacts of the DED order and how local government can assist residents impacted by the termination of DED. On January 28, 2019, I testified to the Immigration Committee of the New York City Council on the impacts of the DED order and how New York City government can assist residents impacted by the termination of DED.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on March 4, 2019 in Washington, D.C.

Amaha Kassa, Esq.